

# Exhibit 51:

## Statement of John Doe E's Nephew

## STATEMENT OF JOHN DOE E'S NEPHEW

1. I am the nephew of John Doe E, who is on the Michigan Sex Offender Registry and a plaintiff in this case. John Doe E has suffered from Fetal Alcohol Syndrome since I have known him.

2. Growing up, I was close to my family, including my uncle, John Doe E and my grandmother. Our family made frequent trips to see each other and spent many holidays together.

3. In 1994 John Doe E was convicted of inappropriate sexual touching against me when I was six years old. The offense complicated and broke our family dynamics.

4. Now in adulthood, I—and my family—have been able to move forward positively. I completed school, attended university, and landed a great job. I also recently got married. Our family has also grown close again; I keep in constant contact with my grandmother (John Doe E's mother) and make frequent trips to visit every year. I have been able to heal from the harm I experienced as a child which has allowed me to forgive my uncle, John Doe E.

5. I do not believe that my uncle, John Doe E, should be subject to or included on the sex offender registry and I support his removal. Despite being on the registry for over 30 years, John Doe E has not reoffended and, instead, has worked to become a productive member of society. The sex offender registry should be for

those offenders who are a risk to the public. I don't believe John Doe E is a risk  
and so he should not be included on the registry.

I certify under penalty of perjury that the above statement is true and correct  
pursuant to 28 U.S.C. § 1746.

[REDACTED]  
Nephew of John Doe E

April 11, 2023